

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA et al.,

*Plaintiffs,*

v.

AMERICAN AIRLINES GROUP INC. and  
JETBLUE AIRWAYS CORPORATION,

*Defendants.*

Case No. 1:21-cv-11558-LTS

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO RESPOND TO DEFENDANTS'  
MOTION FOR ENTRY OF FINAL JUDGMENT AND PERMANENT INJUNCTION**

Pursuant to Local Rule 7.1(b)(3), Plaintiffs respectfully move for leave to file a short response brief to address three new positions Defendants took in their Proposed Final Judgment, Dkt. 354, Exhibit 2 (“Defs’ PFJ”), and accompanying motion, Dkt. 354 (“Defs’ Motion”). Defendants’ filed PFJ was not shared with Plaintiffs until less than one hour before the filing deadline on June 9. Plaintiffs had no meaningful opportunity to respond to three substantive changes Defendants made to their new, filed PFJ compared to the prior version shared with Plaintiffs on June 5. Plaintiffs met and conferred with Defendants regarding this motion for leave to file, and Defendants do not oppose the motion. Plaintiffs’ brief response is attached hereto as Exhibit A, and Plaintiffs’ revised Proposed Final Judgment is attached hereto as Exhibit B.

Dated: June 12, 2023

Respectfully submitted,

/s/ William H. Jones II

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*Massachusetts, and on behalf of*

*the Plaintiff States*

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that Plaintiffs conferred with counsel for Defendants prior to filing. Defendants confirmed that they do not oppose the motion.

/s/ James H. Congdon

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